

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

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|-------------------------------|---|-------------------|
| IN RE: | : | CHAPTER 7 |
| | : | |
| RONALD JEAN MARTIN AGENOR and | : | CASE NO. 14-51529 |
| TONYA WILLIAMS AGENOR, | : | |
| | : | JUDGE HAGENAU |
| Debtors. | : | |
| | : | |

TRUSTEE'S APPLICATION FOR SUBSTITUTION OF ATTORNEYS

Comes now S. Gregory Hays, as Chapter 7 Trustee ("Trustee") in the bankruptcy case of Ronald and Tonya Agenor (collectively, "Debtors"), and represents to the Court as follows:

1. Under a previous order of the Court, Trustee employed the law firm of Lamberth, Cifelli, Stokes, Ellis & Nason, P.A. ("LCSEN") to serve as attorneys for Trustee in this case.
2. Effective March 30, 2015, Michael J. Bargar, an associate of LCSEN, changed law firms and is now an associate of Arnall Golden Gregory, LLP ("AGG").
3. Trustee desires that AGG be substituted for LCSEN as attorneys for the Trustee in this case.
4. Trustee believes that such substitution will serve the best interests of the estate, Debtors, creditors, and other interested parties in that it would be unnecessary to acquaint new counsel with the legal issues bearing on the proper administration of the estate. AGG does not hold or represent an interest adverse to the estate, does not represent any creditor or other known interested party, and is a disinterested person under 11 U.S.C. § 327(a).
5. The attorneys practicing with AGG are admitted to practice in this Court, have knowledge and experience with regard to the matters in which the firm is to be engaged, and are

well qualified to represent Trustee. Attached as Exhibit “A” is the Rule 2014 Verification of AGG.

6. The current (as reduced) hourly billing rates of the attorneys and paralegals who may render services in the case are as follows:

| | | |
|----|----------------------|----------|
| 1. | Neil C. Gordon | \$495.00 |
| 2. | Frank N. White | \$455.00 |
| 3. | Michael F. Holbein | \$415.00 |
| 4. | Michael J. Bargar | \$275.00 |
| 5. | Angela G. Ford | \$175.00 |
| 6. | Nancy J. Overholtzer | \$175.00 |
| 7. | Pamela E. Bicknell | \$175.00 |
| 8. | Carol A. Stewart | \$160.00 |

Depending on need for particular experience or the exigencies of the case, other attorneys may also provide services. The above rates may be increased during the term of the proposed employment or if so awarded by the Court.

7. AGG anticipates seeking reasonable compensation based upon the recognized factors. No compensation will be paid by Trustee to AGG except upon application to and approval by the Bankruptcy Court after notice and hearing as required by law.

(INTENTIONALLY LEFT BLANK)

WHEREFORE, Trustee prays that Arnall Golden Gregory, LLP be substituted for Lamberth, Cifelli, Stokes, Ellis & Nason, P.A. as attorneys for the Trustee in this case, and for such other and further relief as the Court deems just and proper.

Respectfully submitted this 13th of April, 2015.



S. Gregory Hays
Chapter 7 Trustee

Hays Financial Consulting, LLC
3343 Peachtree Road, NE, Suite 200
Atlanta, Georgia 30326
(404) 926-0060
(404) 926-0055 (facsimile)

Proposed Substitute Attorneys for Trustee:

ARNALL GOLDEN GREGORY LLP

By: /s/ Michael J. Bargar
Michael J. Bargar
Georgia Bar No. 645709
michael.bargar@agg.com

171 17th Street, NW, Suite 2100
Atlanta, Georgia 30363
(404) 873-8500

EXHIBIT "A"

**RULE 2014 VERIFICATION WITH REGARD TO
EMPLOYMENT OF ATTORNEYS**

The undersigned hereby declares under penalty of perjury:

1. I am an associate with the law firm of Arnall Golden Gregory, LLP, with offices at 171 17th Street, NW, Suite 2100, Atlanta, Georgia 30363 (the "Firm").

2. The Firm has been asked to represent Trustee in the bankruptcy case of Ronald and Tonya Agenor (collectively, "Debtors"). To the best of my knowledge, the Firm has no professional, business, or other connection with the aforementioned Debtors, their attorney, creditors, or any party in interest in this case, except as set forth below. The Firm represents no interest which would be adverse to the estate of Debtors in connection with the matters upon which the Firm is to be engaged. Disclosure is made that the Firm has previously represented and does represent S. Gregory Hays (in his capacity as a bankruptcy trustee) as special or general counsel in unrelated matters.

3. The Firm will not expect nor receive any compensation from the estate except upon application to and approval by the Bankruptcy Court after notice and hearing.

Dated this 13th day of April, 2015.

By: /s/ Michael J. Bargar
Michael J. Bargar
Georgia Bar No. 645709

CERTIFICATE OF SERVICE

I, Michael J. Bargar, certify that I am over the age of 18, and that I have on the date set forth below served a copy of the foregoing TRUSTEE'S APPLICATION FOR SUBSTITUTION OF ATTORNEYS by United States first class mail with sufficient postage attached to assure delivery upon each of the following entities at the addresses stated:

Office of the United States Trustee
Room 362, Richard B. Russell Building
75 Spring Street, S.W.
Atlanta, Georgia 30303

S. Gregory Hays
Hays Financial Consulting, LLC
3343 Peachtree Road, NE
Suite 200
Atlanta, GA 30326

J. Michael Lamberth
Lamberth, Cifelli, Ellis & Nason, P.A.
3343 Peachtree Road, NE, Suite 550
Atlanta, GA 30326

Ronald Jean Martin Agenor
7527 Roswell Road, NE, #566852
Atlanta, GA 31156

Tonya Williams Agenor
7527 Roswell Road, NE, #566852
Atlanta, GA 31156

Shannon R. Brandao
S. Brandao, LLC
4514 Chamblee Dunwoody Road
Suite 295
Atlanta, GA 30338

This 13th day of April, 2015.

171 17th Street, NW, Suite 2100
Atlanta, Georgia 30363
(404) 873-8500

/s/ Michael J. Bargar
Michael J. Bargar
Georgia Bar No. 645709
michael.bargar@agg.com